

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

FALLS CHURCH MEDICAL CENTER, LLC *et al.*,

Plaintiffs,

v.

M. NORMAN OLIVER, *et al.*,

Defendants.

CASE NO: 3:18-cv-428-HEH

**PLAINTIFFS' MOTION FOR A PROTECTIVE ORDER FOR DR. JANE DOE
TO PROCEED UNDER PSEUDONYM**

Plaintiffs Falls Church Medical Center, LLC d/b/a Falls Church Healthcare Center; Whole Woman's Health Alliance; All Women's Richmond, Inc. d/b/a A Capital Women's Health Clinic; and Virginia League for Planned Parenthood, through their counsel, file this Motion for a Protective Order for Dr. Jane Doe to Proceed under Pseudonym if the Motion to Join an Additional Party and Amend Complaint is granted. Dr. Jane Doe's Declaration is attached as Exhibit A to Plaintiffs' Memorandum in Support. Plaintiffs' Proposed Order is attached as Exhibit B to Plaintiffs' Memorandum in Support.

Dated: August 16, 2018

Respectfully submitted,

/s/ Gail M. Deady

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**Motion for Admission *Pro Hac Vice* to be filed.

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2018, a true and correct copy of the foregoing Plaintiffs' Motion for a Protective Order for Dr. Jane Doe to Proceed under Pseudonym was served on counsel for Defendants represented by the Office of the Attorney General via the Eastern District of Virginia's Electronic Filing System, and mailed to Defendant Robert Tracci pursuant to Federal Rule of Civil Procedure 5(b).

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Dated: August 16, 2018

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